



Department of Energy

Idaho Operations Office
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March 5, 2003

Mr. Dean Nygard, Site Remediation Manager
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Mr. Wayne Pierre, Team Leader
Environmental Cleanup Office
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

SUBJECT: Request for a Milestone Extension Related to Submission of Phased WAG 3,
Group 3 RD/RA Work Plans - (EM-ER-03-064)

Dear Mr. Nygard and Mr. Pierre:

The remedial action objectives, as defined in the OU 3-13 Record of Decision, for the Waste Area Group (WAG) 3, Group 3, Other Surface Soils can be achieved more cost effectively and efficiently if divided into two actions. The Department of Energy (DOE) requests that the WAG 3, Group 3, Remedial Design/Remedial (RD/RA) Action Work Plan be separated into two documents, one for each action. We request that the milestone date for submission of the Work Plan for the second action, Phase II, be extended to October 2007. We believe that good cause exists for an extension under the Federal Facility Agreement/Consent Order (FFA/CO) Section 13.1(e), "Any other event or series of events mutually agreed to by the Parties as constituting good cause, including delays that result from compliance with other federal laws." As we have discussed with you during the Wednesday, February 26th FFA/CO call, a phased approach will allow for a more efficient use of resources and will better integrate CERCLA actions with other cleanup work and environmental requirements.

The Work Plan for the first action (Phase I) will address Remediation Sets 1, 2, and 3, as described in the *WAG 3 Group 3 Prioritization and Site Grouping Report* (DOE-ID 10996, Sept. 2002). These sets account for approximately 90% of the waste volume destined for remediation and eventual disposal in the ICDF. This RD/RA Work Plan will be sent to you on or before August 30, 2003, the enforceable milestone requirement established in the WAG 3, OU 3-13 RD/RA Scope of Work (DOE/ID-10721 Feb. 2000). Remediation activities will begin upon final approval of the work plan, in accordance with FFA/CO review cycle for a primary document. It is anticipated that remediation of Sets 1, 2, and 3 will be completed near the end of 2008; however, the actual schedule will be provided in the Phase I RD/RA Work Plan.

The Phase II RD/RA Work Plan will address Remediation Sets 4, 5, and 6, which account for the balance of the waste volume at INTEC. We propose sending you the draft Phase II RD/RA Work Plan in October 2007. The actual date will be provided in the Phase I Work Plan critical path schedule and will be an enforceable milestone date under the FFA/CO. Characterization sampling for Set 4 will be conducted in early 2008, while the remediation activities for Phase I are being completed. Remediation and disposal activities identified for Sets 4, 5, and 6 could begin in 2009, allowing continuous remediation of Group 3 soils.

Enclosed is the white paper that was emailed to you on February 25, 2003 and provides more detail for this approach.

DOE requests your responses within seven days of receiving this letter, the allotted time per the FFA/CO procedure for extension requests.

Sincerely,



Kathleen E. Hain, Lead
Environmental Restoration Program

Enclosure

cc: M. English, IDHW, DEQ, 1410 N. Hilton, Boise, ID 83706
T. Kluk, DOE-HQ, EM-441
R. Cummings, DOE-HQ, EM 441

Position Paper for Phasing the WAG 3 Group 3 RD/RA Work Plan

This paper summarizes the two-phased approach to the Group 3 Remedial Design/Remedial Action Work Plan (RD/RA WP).

Phase I of the Group 3 RD/RA Work Plan will address Remediation Sets 1, 2, and 3 as described in the *Group 3 Prioritization and Site Grouping Report* (DOE-ID-10996, Sept. 2002). Remediation Sets 1, 2 and 3 accounts for approximately 90% of the waste volume (approximately 305,000 CY) destined for remediation and eventual disposal in the ICDF. The Phase II will address the remaining remediation sets, Sets 4, 5 and 6, which account for the balance of the waste volume (approximately 44,000 CY). The remedial design for Sets 4, 5, and 6 will be addressed in a separate Group 3 Phase II RD/RA WP.

As identified in the Prioritization and Site Grouping Report, the remediation sites identified in Sets 1, 2 and 3 scored highest in the value engineering sessions that were held to group the sites (see table 3-3, page 3-8 of the Report). The sites in Sets 4, 5 and 6 scored lower in the same value engineering session. Additionally, the end-state cleanup plans for the facilities located near the Sets 4, 5 and 6 remediation sites are currently under development. Phasing will also allow better integration of INTEC Environmental Remediation, D&D, and other programs (HLW, SNF, RCRA) cleanup/closure activities.

The proposed approach is to submit the Draft Group 3 Phase I RD/RA Work Plan to the Agencies no later than August 30, 2003, meeting the enforceable milestone date identified in the WAG 3, OU 3-13 RD/RA Scope of Work (DOE/ID-10721, Feb. 2000). Remediation activities would then begin upon final approval of the Phase I RD/RA WP in accordance with the FFA/CO review cycle for a primary document. It is anticipated that remediation of Sets 1, 2 and 3 would be completed near the end of 2008, however, the actual schedule would be provided in the RD/RA WP.

The submittal of the Draft Phase II RD/RA WP would be late 2007 with finalization expected in early 2008. The date would be an enforceable milestone under the FFA/CO as this RD/RA WP would also be a primary document with the appropriate review cycle. The actual date would be provided in the schedule for the Group 3 Phase I RD/RA WP.

By finalizing the Phase II RD/RA WP in early 2008, characterization sampling required prior to remediation could then be conducted for Set 4 in 2008 while the remediation activities are finishing for Phase I. Remediation and disposal activities identified for Sets 4, 5, and 6 could begin in 2009, allowing continuous remediation of Group 3 soils.

The phased approach allows for a more efficient strategy for remediation by planning the remediation efforts of Sets 4, 5 and 6 to a time nearer to when remediation would be performed. Although the phased approach does not accelerate the remediation, it does tie the schedule directly to ICDF through-put. Additionally, the phased approach will allow the Agencies the opportunity to evaluate ICDF's initial operations and characterization/verification efforts. This evaluation may then be used in the Phase II RD/RA work plan by incorporating value engineering and lessons learned.

ICDF Waste Generator	Disposition to ICDF Complex (Calendar Yr)								
	2003 (July Start)	2004	2005	2006	2007	2008	2009	2010	2011
Other WAG Waste	38,400	33,400							
		WAG 3 Phase 1 Remedial Actions					WAG 3 Phase 2 Remedial Actions		
WAG 3 Set 1		3,200							
WAG 3 Set 2			76,800	76,800					
WAG 3 Set 3					74,200	74,200			
WAG 3 Set 4							13,100		
WAG 3 Set 5								19,800	
WAG 3 Set 6									11,700
TOTAL	38,400	36,600	76,800	76,800	74,200	74,200	13,100	19,800	11,700

Notes

- 1- Only significant volumes of waste are depicted on this table. Smaller volumes (<1,000 CY) contributed by the other WAGs after 2004 are not included.
- 2- Following finalization of the Phase I RD/RA WP in early 2004, the Set 1 waste will be characterized and then shipped to the ICDF in late 2004 early 2005 for treatment at the SSSTF.
- 3- Characterization of the WAG 3 Sets 2-6 will be performed the year prior to disposition at the ICDF.
- 4- It is assumed that only half of the volume of soils in Set 2 will need to go to the ICDF. The other half will be clean and will be put back into the excavation.
- 5- Adjustments to the through put rate will be updated based on operational experience. Therefore the volumes disposed per year may be updated.